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February 19, 1997

Pension and Welfare Benefits Programs
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20216

2520032032121

Dear Sirs:

The purpose of this letter is to satisfy the on-time reporting requirement of Title I of ERISA for a non-qualified deferred compensation plan.

The corporation listed below initiated an unfunded non-qualified deferred compensation plan on December 13, 1996 for the benefit of one corporate officer.

Montgomery Insurance and Investment Agency, Inc.
114 S. Detroit Street
Xenia, Ohio 45385
Employer ID No. 31-1304722

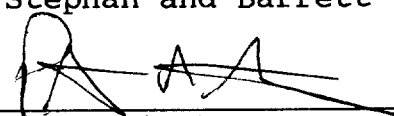
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DOL-PWP/VA

Sincerely,

Gibney, Stephan and Barrett

By


Peter D. Stephan

PDS/bg